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DISTRICT OF SOUTH CAROLINA

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Debtors, by their counsel, hereby move before this Court for an Order allowing Debtors to sell their residence located at 2705 Harrison Road, Columbia, South Carolina. In support of such, Debtors would show this Court the following:

1. Debtors filed a Petition for Relief under Chapter 13 of the Bankruptcy Code on or about September 13, 1999.
2. Debtors are the owners of a residence located at 2807 Harrison Road, Columbia, South Carolina.
3. First Union National Bank is the holder of a first and second mortgage against said residence.
4. Debtors currently have a buyer who has tendered an offer of \$39,000.00 for the home. Debtors are informed and believe that the combined payoff of both mortgages is approximately \$20,000.00.
5. Debtors wish to sell the property for the above-mentioned price and allocate the proceeds as follows: (a) pay all closing costs; (b) pay off and satisfy both mortgages; (c) pay \$10,000.00 toward the balance of the Chapter 13 Plan; (d) use the remainder of \$9,000.00 or less toward a down payment on a new home.


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6. Debtors believe that it is in the best interests of the creditors and the Debtors for the house to be sold, as the sales price will be sufficient to pay a substantial amount of money towards the balance of the Plan.

WHEREFORE, Debtors move before this Court for an Order allowing Debtors to sell the above-described residence and allocate the proceeds as described hereinabove.

Respectfully submitted.

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